

From: [Dan Peacock](#)
To: jseifert@neogen.com
Cc: [John Hebert](#); [Jennifer Gaines](#); [Gene Benbow](#); [Bill Jacobs](#)
Subject: Re: 25lb block
Date: 10/26/2011 10:56 AM

Dear Ms. Seifert,

Thank you for your question for which I have provided an answer below.

Question:

Would EPA allow the use of a 25 lb "salt lick" block formulation?

Answer:

You did not mention an active ingredient, registration number, site, or pest for this 25 lb "salt lick" block size.

Such a product could not be sold legally under any of your current registrations.

The largest block placement currently allowed in and around buildings is 1 lb for Norway and roof rats.

A 25 lb block, like a salt lick, suggests that the person may want to target a much larger mammal, which would be a **new use** and require both a human health and environmental fate and effects assessment and perhaps more data, even including field studies, depending on the use pattern.

We would publish receipt of such a new use in the Federal Register for public comment.

Further, such a new use would also likely be part of our new Public Process for new uses of high public interest, which would require us to announce publicly our Proposed Decision and receive comments prior to a Final Decision.

If you could provide additional information, such as a proposed label, I could give you more detailed feedback, after consultation with our staff about the likely data requirements for such a use, once identified.

Thank You,

Daniel B. Peacock, Biologist
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E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

-----Jenny Seifert <jseifert@neogen.com> wrote: -----

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To: Dan Peacock/DC/USEPA/US@EPA
From: Jenny Seifert <jseifert@neogen.com>
Date: 10/26/2011 09:26AM
Subject: 25lb block

Good morning Dan,

I hope that all is well with you. I have an odd question that I hope you can help me with. We have had a customer ask if we could produce a solid 25lb block of bait that would be secured in a permanent way (continuous feed station, much like a salt lick). Because of current regulations, I struggle to find how something like that would be legal. However, can you provide an opinion on why or why not something like this would be allowable so that I can provide accurate feedback to the customer?

Best Regards,

Jenny

Jennifer J. Seifert

Manager, Regulatory Affairs and R&D

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